

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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IN RE: JUUL LABS, INC., MARKETING SALES  
PRACTICE AND PRODUCTS LIABILITY  
LITIGATION

3:19-md-02913 (WHO)

Hon. William H. Orrick

*This Document Relates to All Plaintiffs Identified in  
Exhibit A to JLI's Omnibus Motion to Dismiss With  
Prejudice Non-Opt Out Plaintiffs' Claims*

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**DECLARATION OF MORGAN M. MEADOR**

I, MORGAN M. MEADOR, hereby declare and state as follows:

1. ***Personal Information.*** My name is Morgan M. Meador. I am a Partner at BrownGreer PLC, located at 250 Rocketts Way, Richmond, Virginia 23231 ("BrownGreer").

2. ***The Capacity and Basis of this Declaration.*** I am over the age of 21. Unless otherwise noted, the matters set forth in this Declaration are based upon my personal knowledge, information received from the parties in this proceeding, and information provided by my colleagues at BrownGreer.

3. ***BrownGreer's Appointment as Settlement Administrator.*** On December 6, 2022, Juul Labs, Inc., and its successors and assigns (collectively "**JLI**"); Plaintiffs' Leadership in MDL No. 2913 and JCCP No. 5052 on behalf of all Personal Injury Plaintiffs; and the JLI National Settlement Trust (collectively, the "**Parties**") entered into a Settlement Agreement to establish a program to resolve the actions, disputes and claims that the settling Personal Injury Plaintiffs and their counsel have or could have asserted against JLI and any other Released Party in respect of the Released Claims and Liabilities. Section 1.40 of the Settlement Agreement named BrownGreer as Personal Injury Settlement Administrator ("Settlement Administrator").

4. ***The Role of the Settlement Administrator.*** The Settlement Administrator's duties in this program include:

(a) Collecting and holding in escrow pending receipt of the Initial Personal Injury Settlement Amount into the Personal Injury Settlement Trust all Eligible Plaintiff Participation Forms (including, but not limited to, Counsel Certification Forms) and Releases submitted by Eligible Plaintiffs who wish to participate in the settlement program.

(b) Providing a list of Personal Injury Opt-Outs and Non-Communicating Plaintiffs to JLI and Plaintiffs' Leadership.

(c) Sending Notices to Counsel for Eligible Plaintiffs who failed to submit complete Eligible Plaintiff Participation Forms and Releases.

5. ***The Purpose of this Declaration.*** I submit this Declaration to detail BrownGreer's execution of a portion of the duties described above.

6. ***Plaintiffs Not Listed in Exhibit 1 to Counsel Certification Forms.*** On or before December 23, 2022, counsel to Personal Injury Plaintiffs submitted Counsel Certification Forms and registered eligible claims, and all claims derivative thereof, with BrownGreer, as required by CMO No. 16.

7. Exhibit 1 to each Counsel Certification Form included—or was supposed to include—a true and complete list of all Personal Injury Plaintiffs represented by each firm.

8. On January 20, 2023, BrownGreer provided the Parties with an Excel spreadsheet containing 12,088 rows of potential plaintiffs that had been identified in Exhibit(s) 1 to the Counsel Certification Forms submitted to BrownGreer. This spreadsheet served to aggregate all plaintiffs listed in each "Exhibit 1" to each law firm's Counsel Certification Form.


9. The thirty-one (31) plaintiffs identified in **Exhibit A** to JLI's Omnibus Motion to Dismiss With Prejudice Non-Opt Out Plaintiffs' Claims were not included in the spreadsheet BrownGreer provided to the Parties on January 20, 2023.

10. These plaintiffs were not included in the spreadsheet BrownGreer provided to the Parties because they were not identified in the Exhibits 1 to their respective counsel's Counsel Certification Forms.

11. Because these plaintiffs were not identified in Exhibits 1 to their respective counsel's Counsel Certification Forms, they were not registered or otherwise enrolled in the Personal Injury Settlement Program and otherwise did not participate in the JLI settlement.

I, Morgan M. Meador, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on March 14, 2025.

  
Morgan M. Meador